

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
NISHA BROOKS-WHITTINGTON
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax
Nisha_Brooks-Whittington@fd.org
6

7 Attorney for Reynaldo Stocker

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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 REYNALDO STOCKER,
15 Defendant.
16

Case No. 2:20-cr-00287-JAD-BNW

**STIPULATION TO CONTINUE
PRETRIAL MOTION DEADLINES**
(Fourth Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
18 Acting United States Attorney, and Mina Chang, Assistant United States Attorney, counsel
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and
20 Nisha Brooks-Whittington, Assistant Federal Public Defender, counsel for Reynaldo Stocker,
21 that the previously ordered deadline for filing of pretrial motions be vacated and that the parties
22 herein shall have to and including September 8, 2021, within which to file the Defendant's
23 pretrial motions currently due August 9, 2021.

24 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
25 shall have to and including September 22, 2021, to file any and all responsive pleadings,
26 currently due August 23, 2021.

1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
2 shall have to and including September 29, 2021, to file any and all replies to dispositive motions,
3 currently due August 30, 2021.

4 The Stipulation is entered into for the following reasons:

5 1. Counsel for the defendant needs additional time to investigate the charge and
6 prepare pretrial motions.

7 2. The defendant is not incarcerated and does not object to the continuance.

8 3. The parties agree to the continuance.

9 4. The additional time requested herein is not sought for purposes of delay, but
10 merely to allow counsel for defendant sufficient time within which to investigate the charge
11 and prepare pretrial motions.

12 5. Additionally, denial of this request for continuance could result in a miscarriage
13 of justice.

14 This is the fourth stipulation to continue filed herein.

15 DATED this 9th day of August 2021.

16 RENE L. VALLADARES
17 Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

18 */s/ Nisha Brooks-Whittington*
19 By _____

/s/ Mina Chang
By _____

20 NISHA BROOKS-WHITTINGTON
Assistant Federal Public Defender

MINA CHANG
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 REYNALDO STOCKER,

7 Defendant.

Case No. 2:20-cr-00287-JAD-BNW

FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER

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10 FINDINGS OF FACT, CONCLUSIONS OF LAW

11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
12 Court finds that:

13 1. Counsel for the defendant needs additional time to investigate the charge and
14 prepare pretrial motions.

15 2. The defendant is not incarcerated and does not object to the continuance.

16 3. The parties agree to the continuance.

17 4. The additional time requested herein is not sought for purposes of delay, but
18 merely to allow counsel for defendant sufficient time to investigate the charge and prepare
19 pretrial motions.

20 5. Additionally, denial of this request for continuance could result in a miscarriage
21 of justice.

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ORDER

IT IS THEREFORE ORDERED that the parties herein shall have to and including September 8, 2021, within which to file the Defendant's pretrial motions.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including September 22, 2021, to file any and all responsive pleadings.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including September 29, 2021, to file any and all replies to dispositive motions.

IT IS SO ORDERED

DATED: 10:58 am, August 13, 2021



**BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE**